

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

JARROD STRINGER, ET AL.,

PLAINTIFFS,

V.

ROLANDO PABLOS, ET AL.,

DEFENDANTS.


JARROD STRINGER, ET AL.,

PLAINTIFFS,

V.

RUTH HUGHS, ET AL.,

DEFENDANTS,



CIVIL NO. SA-16-CV-257-OG

CIVIL NO. SA-20-CV-46-OG

DECLARATION OF JENNIFER BUAAS

My name is Jennifer Buaas, I am over the age of 18 and fully competent to make this declaration, and state the following:

1. I am the Director of Engineering for the Texas Department of Information Resources (DIR) and manage the implementation of projects for the Texas.gov program. In this capacity, I work with the Texas.gov vendors to fulfill agency customer requests.

2. Texas.gov is the official website of the State of Texas and provides portal and payment services for Texas State agencies, eligible local governmental organizations, and institutions of higher education. This enables these entities to conduct online business with their constituents.

3. By statute, DIR is tasked with the management of the Texas.gov program and its associated vendors. In March 2018, DIR awarded contracts for the Texas.gov program to Deloitte Consulting, LLP (Deloitte) for Texas.gov Services and Texas NICUSA LLC (NIC) for Texas.gov Payment Services. These awarded contracts transitioned the Texas.gov business model from a public/private partnership (P3) to a cost-of-service contract model.

4. The process to request new development or enhancements to Texas.gov applications—including online driver license renewals—is as follows:

- a. Customer submits request;
- b. Vendor creates rough order of magnitude (ROM) cost and schedule proposal;
- c. Customer reviews and approves ROM;
- d. Vendor and customer finalize requirements;
- e. Vendor creates final cost and schedule proposal;
- f. Customer approves final schedule and cost estimate; and
- g. Project is initiated.

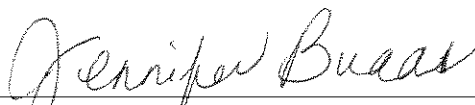
5. DIR estimates that changes to Texas.gov driver license-related functions for DPS would take a minimum of 90 days to complete. That estimate would change depending on the complexity of the specific changes and the scope of the project requested by the customer.

6. This estimate accounts only for the time required for DIR and its vendors to complete the work over which they have control or responsibility. DIR has no control over the work of other individuals, agencies, or groups

7. There will be a cost to the State to complete work of this kind. Estimating that cost is part of the process described above and cannot be completed until a customer request is submitted.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this the 27th day of January, 2020, in Austin, Texas.


JENNIFER BUAAS